

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 23-01997
Robert Robin Rojas)	Chapter 13
Magdiell De Cristo Rojas)	Judge Timothy A. Barnes
Debtors)	

AFFIDAVIT IN SUPPORT OF MOTION TO MODIFY THE PLAN

I, Magdiell De Cristo Rojas, state that:

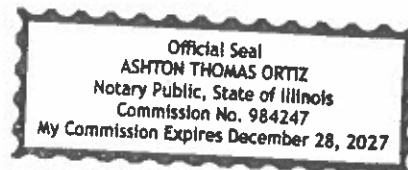
1. I filed for Chapter 13 relief on February 16, 2023 with my husband, Robert Robin Rojas, and our plan was confirmed on June 15, 2023.
2. Per the confirmed plan, payments are \$2,208 for 32 months then \$2,506 for 28 months with unsecured creditors receiving 100% of their claims.
3. The plan was modified on 10/12/2023 to defer the default, lower the plan payment to \$750 and to add language to 8.1 to treat the HUD secured claim.
4. My husband and I currently have a plan payment default of \$2,250 with the April 2024 trustee payment due on 4/18/2024.
5. My husband and I had fallen behind on trustee payments as we incurred expenses for our daughter's education and out of pocket medical bills.
6. My husband and I are seeking to defer the default to the end of the plan as there is room to defer.
7. My husband and I are able to make the \$750 trustee payments going forward as our daughter is graduating in May 2024 and we are budgeting our expenses, but we cannot get caught up on the full default in one lump sum payment.
8. My husband and I want to successfully complete the plan and are filing the motion to modify in good faith and ask that the Court modify the plan.

Magdiell De Cristo Rojas
Magdiell De Cristo Rojas

Subscribed and sworn to before me this 23 day of April, 2024.

[Signature]
Notary Public

My commission expires Dec 28, 2027.



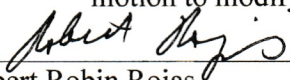
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In Re:)	Case No.: 23-01997
Robert Robin Rojas)	Chapter 13
Magdiell De Cristo Rojas)	Judge Timothy A. Barnes
Debtors)	

AFFIDAVIT IN SUPPORT OF MOTION TO MODIFY THE PLAN

I, Robert Robin Rojas, state that:

1. I filed for Chapter 13 relief on February 16, 2023 with my wife, Magdiell De Cristo Rojas, and our plan was confirmed on June 15, 2023.
2. Per the confirmed plan, payments are \$2,208 for 32 months then \$2,506 for 28 months with unsecured creditors receiving 100% of their claims.
3. The plan was modified on 10/12/2023 to defer the default, lower the plan payment to \$750 and to add language to 8.1 to treat the HUD secured claim.
4. My wife and I currently have a plan payment default of \$2,250 with the April 2024 trustee payment due on 4/18/2024.
5. My wife and I had fallen behind on trustee payments as we incurred expenses for our daughter's education and out of pocket medical bills.
6. My wife and I are seeking to defer the default to the end of the plan as there is room to defer.
7. My wife and I are able to make the \$750 trustee payments going forward as our daughter is graduating in May 2024 and we are budgeting our expenses, but we cannot get caught up on the full default in one lump sum payment.
8. My wife and I want to successfully complete the plan and are filing the motion to modify in good faith and ask that the Court modify the plan.


Robert Robin Rojas

Subscribed and sworn to before me this 23 day of April, 2024.


Notary Public

My commission expires SEP. 22, 2025.

